

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALLEGHENY COUNTY EMPLOYEES'
RETIREMENT SYSTEM, EMPLOYEES'
RETIREMENT SYSTEM OF THE CITY OF
BATON ROUGE AND PARISH OF EAST
BATON ROUGE, DENVER EMPLOYEES
RETIREMENT PLAN, INTERNATIONAL
ASSOCIATION OF MACHINISTS AND
AEROSPACE WORKERS NATIONAL
PENSION FUND, and IOWA PUBLIC
EMPLOYEES' RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

ENERGY TRANSFER LP, KELCY L.
WARREN, THOMAS E. LONG,
MARSHALL MCCREA, and MATTHEW S.
RAMSEY,

Defendants.

Case No. 2:20-cv-00200-GAM

**STIPULATION AND ORDER REGARDING
EXTENSION OF THE CLASS CERTIFICATION DEADLINES**

IT IS HEREBY AGREED, by and between the parties (the "Parties") to the above-captioned action (the "Action") that the following provisions of this stipulation ("Stipulation") shall govern the schedule related to Lead Plaintiffs' motion for class certification. The Stipulation is based on the following and subject to the conditions set forth below:

WHEREAS, pursuant to the Court's July 8, 2021 Case Management Order (the "Case Management Order"), the Parties agreed to a schedule for submission of briefs in connection with Lead Plaintiffs' motion for class certification;

WHEREAS, this Court's Guidelines for Counsel provides a procedure for the Parties to follow when seeking to extend a specific deadline;

WHEREAS, Plaintiffs' deadline for substantial completion of document production in response to Defendants' First Set of Requests for Production was on October 8, 2021;

WHEREAS, Plaintiffs have made productions of documents in response to Defendants' First Set of Requests for Production after October 8, 2021;

WHEREAS, the Parties agree that Defendants should be given additional time to review Plaintiffs' recent productions prior to the beginning of class certification depositions;

WHEREAS, the deadline to complete class certification depositions of Plaintiffs' representatives is currently set for November 22, 2021;

WHEREAS, Defendants' brief and materials in opposition to Plaintiffs' motion for class certification are currently due on January 21, 2022, Plaintiffs' deadline to complete depositions of Defendants' class certification expert(s) is February 22, 2022, and Plaintiffs' reply brief and materials in further support of their motion for class certification are due on March 21, 2022;

WHEREAS, the Parties have discussed and have reached an agreement regarding an extension of the deadlines in the Case Management Order related to Lead Plaintiffs' motion for class certification, as set forth below; and

WHEREAS, pursuant to the Court's Guidelines for Counsel, the proposed extension of time will not delay the scheduling of trial nor otherwise interfere with the orderly progress of the case,

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, that:

1. Defendants' deadline to complete class certification depositions of Lead Plaintiffs and their class certification expert shall move from **November 22, 2021** to **January 10, 2022**;

2. Defendants' deadline to file their brief and other materials in opposition to Lead Plaintiffs' motion for class certification shall move from **January 21, 2022** to **March 1, 2022**;

3. Lead Plaintiffs' deadline to complete class certification depositions of Defendants' class certification expert(s) shall move from **February 22, 2022** to **March 25, 2022**; and

4. Lead Plaintiffs' deadline to file their reply brief and other materials in further support of the motion for class certification shall move from **March 21, 2022** to **April 22, 2022**.

5. Other than as agreed herein, the deadlines of the Case Management Order shall remain in effect except as modified by the Court or agreement of the Parties in accordance with the terms of the Case Management Order.

IT IS SO STIPULATED.

Dated: December 9, 2021

BARRACK, RODOS & BACINE

/s/ Jeffrey W. Golan W/P

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SO ORDERED this 16th day of December 2021.

/s/ Gerald Austin McHugh
United States District Judge